

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

RU-EL SAILOR, )  
Plaintiff, ) CASE NO. 1:20-cv-00660-DAR  
vs. )  
CITY OF CLEVELAND, *et al.*, ) JUDGE DAVID A. RUIZ  
Defendants. )

**DEFENDANTS' MOTION FOR DISMISSAL WITH PREJUDICE AS A SANCTION**

Defendants, by and through the undersigned, pursuant to this Court's inherent authority, jointly move this Court to dismiss Plaintiff's Amended Complaint with prejudice as a litigation sanction for Plaintiff's false deposition testimony, his efforts to tamper with witnesses, and his use of fabricated evidence. The Defendants rely on the arguments and authorities set forth in the accompanying memorandum.

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